

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

Case No. 2:20-cv-00983-TSZ

DECLARATION OF KAYLA STEVENS
IN SUPPORT OF PLAINTIFFS'
RESPONSE TO CITY OF SEATTLE'S
MOTION FOR SPOILIATION AGAINST
PLAINTIFFS HUNTERS CAPITAL;
RICHMARK LABEL; MATTHEW
PLOSZAJ; CAR TENDER; BERGMAN'S
LOCK & KEY; WADE BILLER; AND
ONYX HOMEOWNERS ASSOCIATION

Noting Date: November 15, 2022

I Kayla Stevens, declare as follows:

1. I am a former employee of Hunters Capital.
2. I joined a Signal message group around June 25, 2020, in order to receive updates of what was going on in the Capitol Hill neighborhood. I recall that there were many individuals in the group that were not identifiable by me.
3. I participated in the group mostly passively, and discontinued using the application in early July 2020. I stopped using the app due to the large number of notifications

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SUPPORT OF PLAINTIFFS' RESPONSE TO CITY
OF SEATTLE'S MOTION FOR SPOILIATION
(Case No. 2:20-cv-00983-TSZ) - 1

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1 that I was receiving.

2 4. After early July 2020, I do not recall sending any messages using the Signal
3 message app.

4 5. I have reviewed the five messages that were produced in this case, and I do not
5 recall having sent any other messages using the Signal app.

6 6. I do not recall sending any direct messages using the Signal messages app.

7 7. I did not activate the "disappearing messages" feature of Signal for any of the
8 messages that I sent.

9 I declare under the penalty of perjury under the laws of the United States of America and
10 the State of Washington that the foregoing is true and correct.

11 DATED this 21st day of October, 2022 at Seattle, Washington.

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14 Kayla Stevens
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DECLARATION OF KAYLA STEVENS IN
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